



U.S. Department of Justice

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March 24, 2020

VIA ECF

Honorable Marianne B. Bowler
United States Magistrate Judge
John Joseph Moakley Courthouse
1 Courthouse Way
Boston, MA 02210

Re: **United States v. Bruce Brown**
Criminal No. 20-10041-PBS

Dear Judge Bowler:

Pursuant to 116.6(A) of the Local Rules of the United States District Court for the District of Massachusetts, the government has informed counsel for Mr. Brown that it is declining to provide the names and identifying information of the victims of the charged conduct at this time, as doing so could jeopardize their safety. All discovery materials to be produced that include their names, and specific information that could lead to the discovery of the names, have been redacted.

Further, pursuant to Local Rule 116.6, the government declines to disclose the names of additional unindicted co-conspirators at this time because the investigation in this matter is ongoing and such disclosure would be detrimental to the interests of justice. The government will make such disclosure sufficiently in advance of trial to permit defendants to prepare adequately. This letter is being provided to the court at this time as required under the notice provision of the Local Rule.

Very truly yours,

ANDREW E. LELLING
United States Attorney

By: /s/ Mackenzie A. Queenin
Mackenzie A. Queenin
Assistant U.S. Attorney